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19 UNITED STATES DISTRICT COURT  
20  
21 CENTRAL DISTRICT OF CALIFORNIA  
22

23 ZHANG ZIYI, an individual,

24 Plaintiff,

25 v.

26 CHINA FREE PRESS, INC., a North  
27 Carolina non-profit corporation doing  
business as BOXUN NEWS; WEICAN  
NULL MENG, an individual also known  
as WATSON MENG and also known as  
WEICAN “WATSON” MENG; DOES 1-  
25, inclusive,

Defendants.

CASE NO.: 2:12-cv-05216-JGB (PLA)

**STIPULATION TO CONTINUE  
SCHEDULING CONFERENCE  
AND HEARING ON MOTIONS  
FILED BY DEFENDANT WEICAN  
NULL “WATSON” MENG SO  
THAT THE PARTIES CAN  
PARTICIPATE IN MEDIATION**

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18 Attorneys for Defendant Weican Null Meng  
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1 This Stipulation is by and between Plaintiff Zhang Ziyi (“Plaintiff”), on the one  
2 hand, and Defendants Weican Null Meng (“Meng”) and China Free Press, Inc.  
3 (“CFP”), on the other hand. Plaintiff, Meng and CFP are referred to collectively as  
4 “the Parties.” This stipulation is made with reference to the following facts:

5  
6 RECITALS

7 1. On August 21, 2013, this Court entered an order (Document No. 65)  
8 setting a Scheduling Conference for September 16, 2013.

9 2. Similarly, on August 22, 2013, the Court entered an order (Document  
10 No. 66) setting a hearing on Defendant Weican Null “Watson” Meng’s Motion to  
11 Dismiss Complaint for Lack of Personal Jurisdiction Pursuant to 12(b)(2), Defendant  
12 Weican Null Meng’s Special Motion to Strike Under California Civil Procedure §  
13 425.16, and Motion for Order Requiring Plaintiff to Post an Undertaking Pursuant to  
14 California Code of Civil Procedure section 1030 (the “Bond Motion”) (collectively,  
15 “the Pending Motions”) for September 16, 2013.

16 3. Counsel for Parties have now met and conferred and agreed to continue  
17 the date for the hearing of the Scheduling Conference and the Pending Motions for  
18 approximately ninety days to give the Parties time to participate in a mediation  
19 proceeding in an effort to try to reach settlement of Plaintiff’s claims. Counsel for the  
20 Parties believe that the mediation would be most effective if conducted before the  
21 hearing on the Pending Motions.

STIPULATION

Based on the above facts, the Parties hereby stipulate, agree and ask the Court to order as follows:

1. The Scheduling Conference and the hearing on the Pending Motions shall be continued until December 23, 2013, at 9:00am.

DATED: August 28, 2013

GLASER WEIL FINK JACOBS  
HOWARD AVCHEN & SHAPIRO LLP

LAW OFFICE OF ADAM LEBERTHON

By: /s/ Adam LeBerthon  
ADAM LEBERTHON  
Attorneys for Plaintiff Zhang Ziyi

DATED: August 28, 2013

RANDAZZA LEGAL GROUP

By: /s/ Marc J. Randazza  
MARC J. RANDAZZA  
JASON A. FISCHER  
Attorneys for Defendant Weican Null Meng

DATED: August 28, 2013

DAVID WRIGHT TREMAINE LLP

By: /s/ James Rosenfeld  
JAMES ROSENFELD  
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Attorneys for Defendant  
China Free Press, Inc.